March 31, 2023

VIA ECF

The Honorable Laura Taylor Swain Chief United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Gregoire Tournant, 22-cr-276 (LTS)

Dear Chief Judge Swain:

The Government and Mr. Tournant respectfully submit this letter to jointly update the Court on the parties' discussions regarding an agreed-upon pretrial disclosures schedule. The parties have not yet been able to reach an agreement on the schedule. The defense requests a status conference to address this and other scheduling issues concerning motions and discovery.

The Government does not believe that a status conference is necessary; rather, the Government requests that the Court direct the parties to meet and confer after the Court has resolved the second round of pretrial motions in this case, and provide the Court with an update within 30 days of the Court's decision on any such motions.

Respectfully submitted,

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